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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of)

Federal-State Joint Board on Universal Service)

WAPSI WIRELESS, LLC)

Petition for Waiver of December 30, 2004 Deadline)
in Sections 54.307 (b) and (c) for Submission of)
Quarterly FCC Form 507 Line Count Report)
by Competitive Eligible Telecommunications Carrier)

CC Docket No. 96-45

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Federal Communication Commission
Bureau / Office

To: Chief, Wireline Competition Bureau

PETITION FOR WAIVER OF SECTION 54.307 (b) and (c) SCHEDULE

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Dated: February 8, 2005

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Summary

Wapsi Wireless, LLC ("Wapsi") is requesting waiver of Sections 54.307(b) and 54.307(c)(3) and any other rule that would preclude the Universal Service Administrative Company ("USAC") from accepting and processing the quarterly FCC Form 507 report required to be submitted by it and other competitive eligible telecommunications carriers ("CETCs") by December 30, 2004, and from distributing to Wapsi all portable Universal Service Fund ("USF") support related to that report.

Good cause exists for the requested waiver because Wapsi made virtually all possible efforts to ensure that its FCC Form 507 report was submitted by the December 30, 2004 deadline. It completed, executed and transmitted the report on Monday, December 13, 2004, a full seventeen days prior to the deadline. It sent the report via a normally reliable commercial delivery service (UPS "3 Day Select" delivery service), and arranged for a scheduled delivery on Thursday, December 16, 2004, a full two weeks prior to the deadline. It placed its telephone number clearly and prominently in the return address on the front of the package containing the report so that UPS personnel could readily contact Wapsi in the event of delivery questions or problems. Whereas a Wapsi representative did make an inadvertent clerical error in addressing the package, this error would not have resulted in late delivery if the package had not remained at UPS's Landover, Maryland facility without notice to Wapsi for a full two weeks from December 16 to December 30, 2004. Once Wapsi became aware of the delivery problem when the undelivered package was returned to it on January 5, 2005, it immediately re-sent its FCC Form 507 report to USAC on January 6, 2005 via facsimile and via UPS "Next Day Air" delivery service.

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To: Chief, Wireline Competition Bureau		

PETITION FOR WAIVER OF SECTION 54.307 (b) and (c) SCHEDULE

Wapsi Wireless, LLC ("Wapsi"), by its attorney and pursuant to Section 1.3 of the Commission's Rules, requests waiver of Sections 54.307(b) and 54.307(c)(3) and any other provision of the Rules that would preclude the Universal Service Administrative Company ("USAC") from accepting and processing the quarterly FCC Form 507 report required to be submitted by competitive eligible telecommunications carriers ("CETCs") by December 30, 2004, and from distributing to Wapsi all portable Universal Service Fund ("USF") support related to that report, including High Cost Loop ("HCL") support, Local Switching Support ("LSS"), Interstate Common Line Support ("ICLS") and Long Term Support ("LTS") [to the extent that LTS has not been consolidated into ICLS].

Wapsi, a wireless CETC, transmitted its FCC Form 507 report for the period ending June 30, 2004 to USAC on December 13, 2004 via the "3-Day Select" package delivery service of United Parcel Service ("UPS"). Wapsi paid for its report to be delivered a full fourteen (14) days before the December 30, 2004 submission deadline specified in Section 54.307(c)(3) of the

Rules. However, due to a clerical error, the package was addressed to USAC at the Commission's Capitol Heights, Maryland office for receipt of commercial overnight mail, rather than at USAC's Piscataway, New Jersey office. Whereas this addressing error should not have delayed delivery for anywhere near two weeks, UPS inexplicably and unforeseeably held the package at its Landover, Maryland facility from December 16 to December 30, 2004 without notifying or contacting Wapsi. Wapsi did not become aware of any delivery problem until the package was returned to it undelivered by UPS on the afternoon of January 5, 2005. Wapsi immediately re-sent its subject FCC Form 507 report to USAC on January 6, 2005 via facsimile and via UPS "Next Day Air" delivery service. Wapsi has been informed by USAC that it cannot accept and process the subject FCC Form 507 report without a waiver from the Commission.

Good cause exists for the requested waiver of Sections 54.307(b) and 54.307(c)(3) of the Rules. Wapsi prepared and transmitted its FCC Form 507 report in good faith more than two weeks before the December 30, 2004 filing deadline. It encountered unforeseeable delivery delays due to a combination of unique circumstances comprised of an inadvertent clerical error in the addressing of the package containing its report and the failure of UPS to notify Wapsi of a delivery problem for almost three weeks after the scheduled December 16, 2004 delivery date.

Wapsi Wireless, LLC

Wapsi is an Iowa limited liability company located at 304 Long Avenue (P.O. Box 97), Lost Nation, Iowa 52254. It is the licensee of Broadband Personal Communications Service (PCS) Stations WPOM979 and WPOM982, which serve partitioned portions of the Des Moines – Quad Cities, Iowa-Illinois Major Trading Area. Wapsi provides wireless telecommunications services to the public in Clinton County and Jackson County, Iowa.

Wapsi was designated as a CETC by the Iowa Utilities Board in its Order Designating Eligible Carriers (Iowa Wireless Services L.P. and Associated Companies), Docket No. 199 IAC 39.2(4), issued April 26, 2002. Since the Fourth Quarter of 2002, Wapsi has been receiving portable USF support comprised of HCL, LSS, and ICLS (including LTS) support.

Statement of Facts

The special circumstances supporting grant of the requested waiver of Section 54.307 begin with Wapsi's timely preparation and completion of its FCC Form 507 report for the period ending June 30, 2004. This report, which furnished Wapsi's "line counts" for the seventeen incumbent local exchange carrier ("ILEC") study areas in which Wapsi provides supported services to its wireless customers, was executed by Wapsi's President on Monday, December 13, 2004. A copy of the completed and signed FCC Form 507 report is attached as Exhibit A.

Wapsi transmitted its FCC Form 507 via UPS "3 Day Select" service on the very same day that it was completed and executed -- Monday, December 13, 2004. As evidenced by the UPS package tracking history submitted as Exhibit B, Wapsi did not wait until the last minute, but rather transmitted its report a full seventeen days prior to the December 30, 2004 submission deadline specified in Section 54.307(c)(3) of the Rules. Wapsi purchased the UPS "3 Day Select" delivery service that provided for the delivery of the package containing its FCC Form 507 report on Thursday, December 16, 2004, a full fourteen days prior to the submission deadline.

Unfortunately, the package was erroneously addressed to USAC at "9300 East Hampton Drive, Capitol Heights, MD 20743," which is the address specified for the delivery of commercial overnight mail to this Commission (see copy of package envelope submitted as Exhibit C). As indicated by the Declaration of Jody A. Holtz, Wapsi's Bookkeeper (attached as Exhibit D), this was the result of a clerical error when she misread a printed copy of several June 7, 2004 emails

relating to "Wapsi's CETC Filing Package and Annual Certification Letters, DUE June 30, 2004." Those emails, which are attached to Exhibit D, consisted of instructions from Wapsi's accounting firm regarding various CETC filings. The final June 7, 2004 email, which is printed at the top of page 1 of the emails, provided the addresses for filings with the FCC, including the "9300 East Hampton Drive, Capitol Heights, Maryland 20743" address for receipt UPS and other commercial overnight mail. The earlier June 7, 2004 email, which is printed at the bottom of page 1 and on page 2 of the emails, dealt with various aspects of an earlier FCC Form 507 that had been prepared for Wapsi for the period ending December 31, 2003. Unfortunately, the printed emails were placed in a Wapsi file for FCC Form 507 reports. When Ms. Holtz checked the FCC Form 507 file for a destination address while she was preparing the UPS package on December 13, 2004, she came upon the printed June 7, 2004 emails and erroneously used the underlined Capitol Heights address on the first page thereof without looking at the second page of the printed email (which contained the correct USAC address).

As indicated by the UPS package tracking history (Exhibit B), Wapsi's FCC Form 507 report package was received at UPS's Landover, Maryland facility on December 16, 2004, the day it was supposed to be delivered. Wapsi does not know whether UPS tried to deliver the package to the Commission representatives at the Capitol Heights address or whether UPS gave up when it found no USAC sign at the address. The UPS package tracking history notes on December 23, 2004 (a week after the scheduled delivery date but still a week prior to the submission deadline) that "a correct company or receiver name is needed for delivery; UPS is attempting to obtain this information; a postcard has been sent to the recipient requesting that they contact UPS."

Wapsi does not know what "recipient" was sent a postcard by UPS. Wapsi, the sender, did not receive such a postcard from UPS or any other inquiry or notification of a delivery problem.

More significant, Wapsi's telephone number [(563) 678-2470] was clearly and prominently included in the return address on the upper left-hand corner of the address label for the FCC Form 507 report's package (Exhibit C). UPS could have readily telephoned Wapsi on December 16, 2004 or thereafter to clarify the destination address for the package. No such telephone call was received by Wapsi or its representatives.

Instead, the FCC Form 507 package appears to have been held at UPS's Landover, Maryland facility for a full and critical two weeks until December 30, 2004. Wapsi does not know whether the reason for this two-week delay for a package scheduled for "3 Day Select" delivery was due to the heavy volume of pre-Christmas deliveries or some other reason. The UPS package tracking history notation for December 30, 2004 indicates that "a correct company or receiver name is needed for delivery; UPS is attempting to obtain this information; package returned to sender" (Exhibit B).

The package was finally returned undelivered to Wapsi at 3:51 PM Central Standard Time on Wednesday, January 5, 2005 (Exhibit B). This was the first time that Wapsi learned or suspected that its FCC Form 507 report had not been delivered to USAC on December 16, 2004. Because it had transmitted the report over two weeks before the filing deadline and had not been contacted or informed of a delivery problem by UPS, Wapsi had had no reason to suspect that there had been any problem regarding timely delivery.

Wapsi immediately re-sent its subject FCC Form 507 report to USAC at its Piscataway, New Jersey office on Thursday, January 6, 2005 via facsimile (confirmation submitted as Exhibit E) and via UPS "Next Day Air Service." As evidenced by the UPS Tracking history for the re-sent package (Exhibit F), it was delivered to USAC at 10:12 AM Eastern Time on Friday, January 7, 2005.

On January 6, 2005, Wapsi representatives were informed by USAC's staff that the subject FCC Form 507 report would not be accepted or considered without a waiver from the Commission.

Good Cause Exists for Waiver of Section 54.307 of the Rules

Section 1.3 of the Rules permits the Commission's rules to be waived for good cause shown. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest. *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990). In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of public policy on an individual basis. *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972).

In the present case, Wapsi made reasonable and good faith efforts to ensure that its FCC Form 507 report was submitted well before the December 30, 2004 deadline. It completed, executed and transmitted the report on Monday, December 13, 2004, a full seventeen days prior to the deadline. It transmitted the report via a normally reliable commercial delivery service (UPS "3 Day Select" delivery service), and arranged for a scheduled delivery on Thursday, December 16, 2004, a full two weeks prior to the submission deadline. It placed its telephone number clearly and prominently in the return address on the front of the package containing the report so that UPS personnel could readily contact Wapsi in the event of any delivery questions or problems.

Until the package containing its FCC Form 507 report was returned to Wapsi on the afternoon of Wednesday, January 5, 2005, it had no reason to suspect that the report had not been delivered well prior to the December 30, 2004 deadline. Once Wapsi became aware of the delivery

problem, it immediately re-sent its report to USAC via both facsimile and next day commercial delivery service.

Wapsi's inadvertent clerical error in addressing the FCC Form 507 report package admittedly made its delivery somewhat more difficult. Even if this clerical error were solely or predominately responsible for the late delivery of the report, it would be unduly harsh and inequitable to deprive Wapsi of three months of portable USF support for such an innocent and unintentional mistake. In this regard, it is notable that the Commission affords its own employees substantial latitude in this area, and has long held that Section 4(i) of the Communications Act authorizes it to correct clerical and other inadvertent ministerial errors contained in its orders. *Mobile UHF, Inc.*, 16 FCC Rcd 22945 (2001); *Robert O. Benz*, 13 FCC Rcd 2898, 2900-01 (WTB 1998). Moreover, the courts have long recognized the right and authority of administrative agencies to correct their inadvertent ministerial errors. *American Trucking Associations v. Frisco Transp. Group*, 359 U.S. 133, 145 (1958); *Howard Sober, Inc. v. ICC*, 628 F.2d 36, 41 (D.C. Cir. 1980).

In the instant case, the precautions taken by Wapsi in transmitting its report seventeen days early by a normally reliable three-day commercial delivery service and in placing its telephone number prominently in its return address should have ensured timely submission before the December 30, 2004 deadline even if its clerical addressing error had caused some delay. Wapsi transmitted its report on Monday, December 13, 2004 (seventeen days prior to the deadline) and purchased UPS "3 Day Select" delivery service with a scheduled delivery date of Thursday, December 16, 2004 (fourteen days prior to the deadline). If UPS had returned the 3-day package to Wapsi on or shortly after its initial December 16, 2004 delivery attempt and had not held the package in its Landover office for the two weeks from December 16 to December 30, 2004, Wapsi would have discovered the delivery problem prior to the December 30, 2004 deadline and made

alternative submission arrangements. If UPS had used the Wapsi telephone number on the face of the package to call Wapsi and clarify the delivery address at any time during the December 16 to December 30, 2004 period, Wapsi would have discovered the delivery problem prior to the December 30, 2004 deadline and made alternative submission arrangements. If UPS had taken the package into the Commission facility at the Capitol Heights address on December 16 and inquired about the location of USAC (or, if UPS did and the Commission personnel at the site recognized the likely addressing error), Wapsi would have discovered the delivery problem prior to the December 30, 2004 deadline and made alternative submission arrangements.

In *Federal-State Joint Board on Universal Service; Centennial Cellular Corporation's Request for Waiver of Section 54.307(b) of the Commission's Rules*, 14 FCC Rcd 4350 (CCB/APD March 4, 1999), the then-Accounting Policy Division waived the July 31, 1998 deadline for submitting line count data to USAC, and directed USAC to accept an August 20, 1998 data submission by a Puerto Rican wireless CETC as timely. The Division accepted the CETC's rationale that "the confusion and volume of new information surrounding universal service" caused it to overlook the July 31 deadline; and that the occurrence in July 1998 of a general government strike lasting several days and a Puerto Rico Telephone Company (the ILEC with which it interconnected) month-long strike had strained its time and resources and caused a neglect of its routine duties.

In *Federal-State Joint Board on Universal Service, United States Cellular Corporation, Petition for Waiver of Section 54.307(c) of the Commission's Rules and Regulations*, 19 FCC Rcd 12418 (WCB July 9, 2004), the Wireline Competition Bureau waived Section 54.307(c) of the Rules and directed USAC to accept line count data submitted by a wireless CETC on October 17, 2001 (after the September 30, 2001 deadline) and on January 13, 2002 (after the December 30, 2001

deadline). The Bureau found that, although the CETC filing obligations had been clarified in an order released on November 8, 2001, it was reasonable for the CETC to believe that they were not mandatory until the January 8, 2002 effective date of the order.

In Federal-State Joint Board on Universal Service, Smithville Telephone Company, Inc., Petition for Waiver of Section 54.301 Local Switching Support Data Submission Reporting Date for an Average Schedule Company, 19 FCC Rcd 8891 (WCB/TAP May 18, 2004), the Telecommunications Access Policy Division waived the October 1, 2003 LSS data filing deadline in Section 54.301(b) of the Rules, and directed USAC to accept a submission by an ILEC that apparently was not made until early 2004. The Division found that the death of the ILEC's President on September 8, 2003, and the illness of its regulatory accountant during November and December 2003 warranted a deviation from the October 1 deadline.

Wapsi's special circumstances herein fall well within the parameters found to support the requisite good cause in the three foregoing waiver orders. It acted reasonably, prudently and in good faith to ascertain the appropriate FCC Form 507 filing requirements and deadlines, to prepare and complete its FCC Form 507 report long before it was due, and to transmit its FCC Form 507 report via a reliable commercial delivery service with a scheduled delivery date a full two weeks prior to the December 30 deadline. Whereas it can be argued that Centennial Cellular Corporation and/or Smithville Telephone Company might have taken additional reasonable steps to overcome the disruptions caused by the new universal service requirements, strikes, death and illness that caused them to miss their deadlines, Wapsi could have taken no other reasonable or effective corporate action to ensure timely submission. Unless and until humans acquire powers of perfection far beyond those possessed by anyone alive today, clerical errors will continue to be made occasionally by even the best private sector and government employees. The two-week

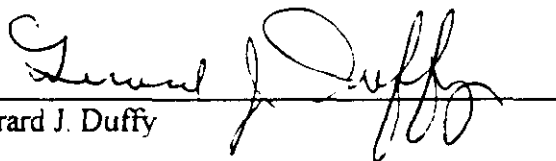
cushion as well as the placement of Wapsi's telephone number prominently on the front of the package should have guaranteed timely delivery by the usually reliable UPS even if the clerical addressing error on Wapsi's package had caused some delay and re-routing.

Hence, Wapsi has established the existence of special circumstances that warrant waiver of the subject December 30, 2004 submission deadline. Wapsi is providing supported services to approximately 851 wireless customers in rural Iowa. It should not be deprived of portable USF support needed to help it provide these services when it did everything reasonably possible to ensure timely submission of its subject FCC Form 507 report.

Conclusion

Good cause having been shown, the Commission is respectfully requested to grant the requested waiver of Sections 54.307(b) and 54.307(c) of the Rules, and to direct USAC to accept as timely the Wapsi FCC Form 507 report re-submitted to it on January 6, 2005 via facsimile and on January 7, 2005 via overnight UPS delivery.

Respectfully submitted,
WAPSI WIRELESS, LLC

By 
Gerard J. Duffy

Its Attorney

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Dated: February 8, 2005

EXHIBIT A

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351107	
2	Carrier Study Area Name	alpha characters	Baldwin-Nashville Telephone Co	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number [including area code]	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	7	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	7	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351242	
2	Carrier Study Area Name	alpha characters	Miles Cooperative Telephone Assn	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number [including area code]	9 numeric digits	563-678-2470	

Block 2 - Line Counts

8	Residential and Single-Line Business Access Lines in Service	numeric digits	112	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	112	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
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Line Count Report

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OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351110	
2	Carrier Study Area Name	alpha characters	Bernard Telephone Company, Inc.	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	4	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	4	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351125	
2	Carrier Study Area Name	alpha characters	Central Scott Telephone Company	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	

Block 2 - Line Counts

8	Residential and Single-Line Business Access Lines in Service	numeric digits	4	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	4	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351222	
2	Carrier Study Area Name	alpha characters	La Motte Telephone Company	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number [including area code]	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	23	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	23	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351191	
2	Carrier Study Area Name	alpha characters	Grand Mound Cooperative Telephone	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number [including area code]	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	102	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	102	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Interstate Common Line Support Mechanism
Line Count Report

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OMB Control No. 3060-0972
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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351276	
2	Carrier Study Area Name	alpha characters	Preston Telephone Company	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	173	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	173	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Line Count Report

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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351229	
2	Carrier Study Area Name	alpha characters	Lost Nation-Elwood Telephone Co	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number [including area code]	9 numeric digits	563-678-2470	

Block 2 - Line Counts

8	Residential and Single-Line Business Access Lines in Service	numeric digits	132	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	132	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Line Count Report

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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351130	
2	Carrier Study Area Name	alpha characters	Clarence Telephone Company	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	1	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	1	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351097	
2	Carrier Study Area Name	alpha characters	Andrew Telephone Company, Inc.	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	7	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	7	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351264	
2	Carrier Study Area Name	alpha characters	Olin Telephone Company, Inc.	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	2	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	2	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351241	
2	Carrier Study Area Name	alpha characters	Mechanicsville Telephone Company	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	1	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	1	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS

Block 1 - Contact Information

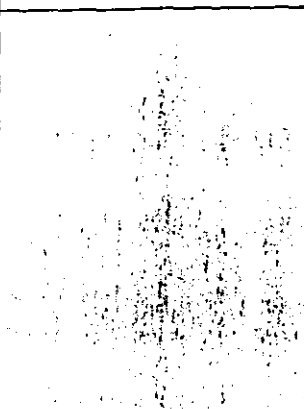

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351343	
2	Carrier Study Area Name	alpha characters	Wyoming Mutual Tel Co	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	

Block 2 - Line Counts

8	Residential and Single-Line Business Access Lines in Service	numeric digits	2	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	2	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351121	
2	Carrier Study Area Name	alpha characters	Center Junction Telephone Co	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number (including area code)	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	1	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	1	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351150	
2	Carrier Study Area Name	alpha characters	Dixon Telephone Co	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number [including area code]	9 numeric digits	563-678-2470	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	1	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	1	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	351263	
2	Carrier Study Area Name	alpha characters	Ogden Telephone Co	
3	Service Provider Identification Number	9 numeric digits	143025500	
4	Data As Of	mm/dd/yyyy	6/30/2004	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Tom Mullins	
7	Contact Telephone Number [including area code]	9 numeric digits	563-678-2470	

Block 2 - Line Counts

8	Residential and Single-Line Business Access Lines in Service	numeric digits	1	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	1	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

FCC FORM 507
Interstate Common Line Support Mechanism
Line Count Report

LINE COUNT DATA COLLECTION FOR PATH 2 AND PATH 3 CARRIERS									
Block 1 - Contact Information									
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	Column 5 Acquired Residential and Single-Line Business Access Lines in Service	Column 6 Acquired Multi-Line Business Access Lines in Service	Column 7 Acquired Total Number of Access Lines in Service	Column 8 Name of Carrier From Which Lines Were Acquired	Column 9 Study Area Code From Which Lines Were Acquired	
1	Carrier Study Area Code	5 numeric digits	351160						
2	Carrier Study Area Name	alpha characters	Farmers & Businessmens Telephone Company						
3	Service Provider Identification Number	9 numeric digits	143025500						
4	Data As Of	mm/dd/yyyy	6/30/2004						
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 2 or Path 3	Path 3						
6	Contact Name	alpha characters	Tom Mullins						
7	Contact Telephone Number (include area code)	9 numeric digits	563-678-2470						
8	Sheet number	numeric digit(s)	1						
9	Total Number of Sheets	numeric digit(s)	1						
Block 2 - Line Counts for Each Disaggregation Zone (Complete One Line for Each Zone)									
	Disaggregation Zone Name	Column 2 Residential and Single-Line Business Access Lines in Service	Column 3 Multi-Line Business Access Lines in Service	Column 4 Total Number of Access Lines in Service	Column 5 Acquired Residential and Single-Line Business Access Lines in Service	Column 6 Acquired Multi-Line Business Access Lines in Service	Column 7 Acquired Total Number of Access Lines in Service	Column 8 Name of Carrier From Which Lines Were Acquired	Column 9 Study Area Code From Which Lines Were Acquired
10	Wheatland Zone 1	144	0	142					
11	Wheatland Zone 2	41	0	38					
12				0					
13	Calamus Zone 1	55	0	55					
14	Calamus Zone 2	38	0	37					
15									
16									
17									
18									
19									
20									
21									

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 507 ON ITS OWN BEHALF:

**Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 507, Line Count Report for
Interstate Common Line Support Mechanism, on Behalf of Reporting Carrier**

I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 507; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier <u>WAPS1 WIRELESS LLC</u>			
Signature of authorized officer or employee <u><i>Tommy R Mullins</i></u>		Date <u>12/13/04</u>	
Printed name of authorized officer or employee <u>TOMMY R MULLINS</u>			
Title or position of authorized officer or employee <u>PRESIDENT</u>			
Telephone number of authorized officer or employee: <u>563 1678-2470 ext</u>			
Study Area Code of Reporting Carrier	<u>359041</u>	Filing Due Date for this form (mm/dd/yyyy)	<u>12/30/2004</u>
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>			

Interstate Access Support Line Count

Date: November 23, 2004

CETC Name: Wapsi Wireless, LLC

CETC Study Area Code (SAC): 359041

Contact Name: Tom Mullins

Contact Telephone Number: 563-678-2470

Lines Reported As Of: September 30, 2004

Areas are Eligible for Support/Ineligible for Support (select one): **Eligible for Support**

[illegible]

High Cost Loop, Local Switching Support, and Long Term Support Line Count

Date: November 23, 2004

CETC Name: Wapsi Wireless, LLC

CETC Study Area Code (SAC): 359041

Contact Name: Tom Mullins

Contact Telephone Number: 563-678-2470

Lines Reported As Of: June 30, 2004

Areas are Eligible for Support/Ineligible for Support (select one): Eligible for Support

Incumbent Carrier Name	Incumbent Carrier SAC	Incumbent Disaggregation Path Selection (1, 2 or 3)	Disaggregation Zone Name (if applicable)	Total Number of Lines in Service
Miles Cooperataive Tel. Assn.	351242	Path 1	N/A	81
Farmers & Businessmens Tel Co	351160-Wheatlan	Path 3	Wheatland Zone 1	142
Farmers & Businessmens Tel Co.	351160-Wheatlan	Path 3	Wheatland Zone 2	38
Farmers & Businessmens Tel Co.	351160-Calamus	Path 3	Calamus Zone 1	55
Farmers & Businessmens Tel Co.	351160-Calamus	Path 3	Calamus Zone 2	37
La Motte Telephone Co.	351222	Path 1	N/A	4
Grand Mound Coop Tel.	351191	Path 1	N/A	93
Preston Telephone Company	351276-Preston	Path 1	N/A	115
Lost Nation-Elwood Tel Co.	351229	Path 1	N/A	124
Central Scott Telephone Co.	351125-McCausl	Path 1	N/A	1
Clarence Telephone Company	351130	Path 1	N/A	1
Olin Telephone Company, Inc.	351264-Olin	Path 1	N/A	2
Preston Telephone Company	351276-Goose L.	Path 1	N/A	32
Central Scott Telephone Co.	351125- Eldridge	Path 1	N/A	2
Central Scott Telephone Co.	351125-Donahue	Path 1	N/A	1
Mechanicsville Telephone Co.	351241	Path 1	N/A	1

EXHIBIT B


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UPS United States

[Shipping](#) | [Tracking](#) | [Support](#) | [Business Solutions](#)

Tracking

Log-In User ID:

Password:

[Forgot Password](#)[Register](#)

- [Track by Tracking Number](#)
- [Track by Reference Number](#)
- [Import Tracking Numbers](#)
- [Track by E-mail](#)
- [Access Quantum View](#)
- [Void a Shipment](#)
- [Help](#)

**Track by Tracking Number****View Details**

Status: Delivered
Delivered on: Jan 5, 2005 3:51 P.M.
Signed by: HOLTZ
Location: OFFICE
Delivered to: LOST NATION, IA, US
Shipped or Billed on: Dec 13, 2004

Tracking Number: 1Z 539 199 12 4285 616 6
Service Type: 3 DAY SELECT
Weight: 1.00 Lb

Package Progress:

Date/ Time	Location	Activity
Jan 5, 2005 3:51 P.M.	HIAWATHA, IA, US	DELIVERY
Dec 30, 2004 10:35 P.M.	LAUREL, MD, US	ARRIVAL SCAN
9:30 P.M.	LANDOVER, MD, US	DEPARTURE SCAN
8:56 P.M.	LANDOVER, MD, US	ORIGIN SCAN
10:38 A.M.	LANDOVER, MD, US	A CORRECT COMPANY OR RECEIVER NAME IS NEEDED FOR DELIVERY. UPS IS ATTEMPTING TO OBTAIN THIS INFORMATION; PACKAGE RETURNED TO SENDER
Dec 23, 2004 9:48 P.M.	LANDOVER, MD, US	A CORRECT COMPANY OR RECEIVER NAME IS NEEDED FOR DELIVERY. UPS IS ATTEMPTING TO OBTAIN THIS INFORMATION; A POSTCARD HAS BEEN SENT TO THE RECIPIENT REQUESTING THAT THEY CONTACT UPS.
9:50 A.M.	LANDOVER, MD, US	A CORRECT COMPANY OR RECEIVER NAME IS NEEDED FOR DELIVERY. UPS IS ATTEMPTING TO OBTAIN THIS INFORMATION
Dec 16, 2004 5:54 A.M.	LANDOVER, MD, US	ARRIVAL SCAN
12:26 A.M.	LAUREL, MD, US	DEPARTURE SCAN
Dec 15, 2004 8:45 P.M.	LAUREL, MD, US	ARRIVAL SCAN
Dec 14, 2004 1:36 P.M.	HODGKINS, IL, US	DEPARTURE SCAN
6:58 A.M.	HODGKINS, IL, US	ARRIVAL SCAN
2:09 A.M.	DAVENPORT, IA, US	DEPARTURE SCAN
1:17 A.M.	DAVENPORT, IA, US	ARRIVAL SCAN
Dec 13, 2004 10:00 P.M.	HIAWATHA, IA, US	DEPARTURE SCAN
6:53 P.M.	HIAWATHA, IA, US	ORIGIN SCAN
4:46 P.M.	US	BILLING INFORMATION RECEIVED

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 Tracking Questions

→ [Go to Tracking Number FAQ](#)

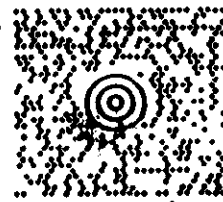
EXHIBIT C

FROM:
SHIPPING DEPT.
(563) 678-2470
EI TELEMARKETING
304 LONG AVE
LOST NATION IA 52254

1 LBS 1 OF 1

SHIP TO:

UNIVERSAL SERVICE ADMINISTRATIVE CO
9300 EAST HAMPTON DRIVE
CAPITOL HEIGHTS MD 20743



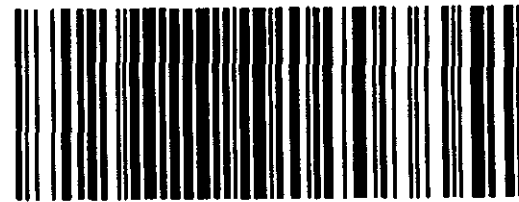
MD 207 2-31



UPS 3 DAY SELECT

3

TRACKING # 1Z 199 12 4285 6166



BILLING: P/P

UOW 8 0 27 hp LaserJet 1 36 DA 10/2004

Fold here and place in label pouch

WRONG ADDRESS - NOTE OUR TELEPHONE NUMBER
IS LISTED ABOVE WITH SHIPPING DEPT. INFORMATION

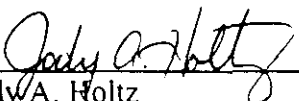
EXHIBIT D

DECLARATION

I, Jody A. Holtz, declare the following under penalty of perjury:

1. I am the Bookkeeper for Wapsi Wireless, LLC ("Wapsi").
2. On December 13, 2004, I filled out the United Parcel Service ("UPS") shipping form for a FCC Form 507 report to be submitted by Wapsi to the Universal Service Administrative Corporation ("USAC").
3. On June 7, 2004, I had engaged in some email correspondence with Anita Sprenger of Kiesling Associates, our accountants. In one of the emails, Anita had given me a Capitol Heights, Maryland address for documents sent to the Federal Communications Commission via UPS and other commercial delivery services. In the other email, Anita had provided some comments and instructions regarding a prior FCC Form 507 that was being prepared in June 2004.
4. Sometime on or after June 7, 2004, I printed out the emails of that date from Anita Sprenger. A copy of the printed emails is attached to this Declaration. I underlined the Capitol Heights, Maryland address on the first page of the printed copy. However, because one of the emails dealt with FCC Form 507, I ultimately filed it in a folder that I use for reference with respect to FCC Form 507 reports.
5. On December 13, 2004, while I was filling out the UPS shipping form, I looked in my FCC Form 507 file for USAC's address, saw the printed June 7, 2004 emails with the underlined Capitol Heights, Maryland address on the first page, and mistakenly typed that address on the UPS form without looking at the second page (where the correct USAC address was listed).
6. I sent the FCC Form 507 report by UPS 3 Day Select Service, which meant that it would be delivered on or before Thursday, December 16, 2004. Because I had sent the package long before its December 30 due date, I never worried about it being delivered on time.
7. I never suspected that there was a problem with the delivery of the package until it was returned by UPS on January 5, 2005. Because the package arrived during the late afternoon, I did not see it until the next morning. I immediately called USAC, had the form faxed to USAC's office, and sent the original signed copy to USAC via UPS Next Day Air service for delivery on January 7, 2005.

The foregoing statements are based upon my direct personal knowledge, and are true and correct.



Jody A. Holtz

Date: February 4, 2005

Jody

From: "Anita M. Sprenger" <asprenger@Kiesling.com>
To: "Jody" <jodyh@lnetelco.com>
Sent: Monday, June 07, 2004 2:46 PM
Subject: RE: Wapsi's CETC Filing Package and Annual Certification Letters, DUE June 30, 2004

Hi Jody,

I called you just a minute ago and Chris said that you stepped out of the office.

I went to the FCC website, since Marlene Dortch is with the FCC, to see if I could find something out there myself instead of trying to call someone. What I found was a list of addresses of where to send documents. The address for 445 12th Street, Washington DC 20554 is for companies using United States Postal Service first class, express, or priority mail and the address for 9300 East Hampton Drive, Capitol Heights, MD 20743 is where companies would send their documents using any other service besides the USPS. Therefore, if you are using UPS, you will need to use the 9300 East Hampton Drive address.

Sorry about the confusion, I guess I was given the wrong explanation last year when I called. Hope this helps.

Anita

877-877-1929

From: Jody [mailto:jodyh@lnetelco.com]
Sent: Monday, June 07, 2004 12:50 PM
To: Anita M. Sprenger
Subject: Re: Wapsi's CETC Filing Package and Annual Certification Letters, DUE June 30, 2004

Got it. Thanks!

----- Original Message -----

From: Anita M. Sprenger
To: lnation@netins.net
Cc: Richard L. Bruner
Sent: Monday, June 07, 2004 9:45 AM
Subject: Wapsi's CETC Filing Package and Annual Certification Letters, DUE June 30, 2004

June 7, 2004

Wapsi Wireless, L.L.C.

Dear Tom:

*

Attached are the FCC Form 507 Line Count, High Cost Loop, and Interstate Access Support data that you need to file in order to receive Interstate Common Line, High Cost Loop, Long Term, Local Switching and Interstate Access support funds, from Universal Service Administrative Company (USAC), for your wireless CETC.

We have filled out the FCC Form 507 Line Count and data based on the spreadsheets provided to us as of Month End December 31, 2003. We made every effort to put each wireless customer in the appropriate Study Area based on their billing address. A completed 507 Line Count Form is required for each listed Study Area.

The last tab on the Form 507 spreadsheet is the 507 Certification that needs to be completed by an officer or authorized

6/7/2004

You need to include a copy of each *507 Line Count Form* (you should have 14 Form 507 Line Count Forms) and the *Form 507 Certification page*, referred to above. In addition, you will need to print a copy of the sheet titled *Interstate Access Support Line Count* (IAS uses the March 31 line count data) and the sheet titled *High Cost Loop, Local Switching Support, and Long Term Support Line Count*. Send all of these documents by Overnight or Expedited Mail to the following address:

Universal Service Administrative Company
444 Hoes Lane
RRC 4A1060
Piscataway, NJ. 08854

In addition, the Annual Certification Forms for both ICLS and IAS Support are due on June 30, 2004. I have attached both of the annual certifications letters; and you will need to send a copy of each letter to both Irene Flannery (USAC) and Marlene Dortch (FCC). Their addresses are listed at the top of the letters. Be sure to fill out the signature section before you send them. The Annual Certifications are very important so don't forget this step.

This filing, including the line count data and the annual certifications, needs to be received at USAC and the FCC by the June 30 2004 due date. Please remember that if the filing package or the annual certifications are received on July 1 or later, you will not receive support funds for the quarter. We encourage you to prepare these documents upon receipt and use a delivery method that will provide evidence that your forms were delivered by June 30th.

Please respond to this e-mail so that we can be sure that your company has received the filing package and the Annual Certification letters.

If you have any questions, please call Dick Bruner or me at 515-223-0159, or e-mail to: rbruner@kiesling.com or asprenger@kiesling.com.

Anita M. Sprenger
Accountant

KIESLING ASSOCIATES LLP
7780 Office Plaza Drive, S
Suite 184
West Des Moines, IA 50266-2337
Phone: (515) 223-0159
Fax: (515) 223-5429
Email: asprenger@kiesling.com
www.kiesling.com

EXHIBIT E

TRANSMISSION VERIFICATION REPORT

TIME : 01/06/2005 11:21
NAME : LNE PHONE
FAX : 5636782300
TEL : 5636782470
SER. # : BROM3J953062

DATE, TIME
FAX NO./NAME
DURATION
PAGE(S)
RESULT
MODE

01/06 11:12
18668734666
00:08:54
21
OK
STANDARD
ECM

FAXED FCC Form 507 TO USAC THEN SENT ORIGINAL

EXHIBIT F


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UPS United States

Shipping

Tracking

Support

Business Solutions

Tracking

Log-In User ID:

Password:

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- [Import Tracking Numbers](#)
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Track by Tracking Number

[View Details](#)

Status: Delivered
Delivered on: Jan 7, 2005 10:12 A.M.
Signed by: GAMBLE
Location: DOCK
Delivered to: US

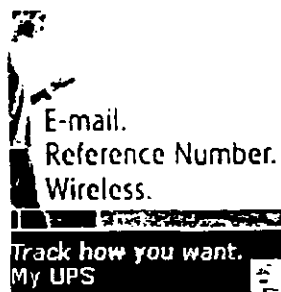
Tracking Number: 1Z FA5 751 22 1000 099 9
Service Type: NEXT DAY AIR

Package Progress:

Date/ Time	Location	Activity
Jan 7, 2005		
10:12 A.M.	BOUND BROOK, NJ, US	DELIVERY
8:00 A.M.	BOUND BROOK, NJ, US	OUT FOR DELIVERY
7:15 A.M.	BOUND BROOK, NJ, US	ARRIVAL SCAN
6:30 A.M.	NEWARK, NJ, US	DEPARTURE SCAN
5:57 A.M.	NEWARK, NJ, US	ARRIVAL SCAN
4:19 A.M.	LOUISVILLE, KY, US	DEPARTURE SCAN
12:46 A.M.	LOUISVILLE, KY, US	ARRIVAL SCAN
Jan 6, 2005		
10:28 P.M.	CEDAR RAPIDS, IA, US	DEPARTURE SCAN
9:21 P.M.	CEDAR RAPIDS, IA, US	ARRIVAL SCAN
9:02 P.M.	HIAWATHA, IA, US	DEPARTURE SCAN
8:34 P.M.	HIAWATHA, IA, US	ORIGIN SCAN
4:05 P.M.	HIAWATHA, IA, US	PICKUP SCAN

Tracking results provided by UPS: Jan 7, 2005 3:51 P.M. Eastern Time (USA)

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